

COQUILLE INDIAN TRIBE

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CAET RECEIVED

FEB 07 2000

Survey and Manage SEIS
Content Analysis Enterprise Team
Attn: USDA Forest Service - CAET
P.O. Box 221090
Salt Lake City, UT 84122

2/2/00

Re: Public Comments on DSEIS

Dear Content Analysis Enterprise Team:

The Coquille Indian Tribe currently manages approximately 5,400 acres of forestlands (Coquille Forest) under the same standards and guidelines as the adjacent federal land management agencies (Coos Bay District BLM). This places us in a unique position as the only Tribe in the nation that must conduct the Survey and Manage / Protection Buffer (S&M/PB) standards and guidelines in the Record of Decision (ROD) for the Northwest Forest Plan (NFP). From that standpoint, these comments may be considered both public and internal.

The Tribe wishes first to recognize that the problems associated with the S&M/PB species are mainly due to an overwhelming lack of knowledge about many of these species and how to find them. As stated by Phil Hall during a DSEIS briefing, the S&M/PB standards and guidelines were thrust into the NFP at the last moment, and the best science was not utilized. To set the context, Figure 1-1 of the DSEIS clearly shows that regardless of which alternative is chosen the relative benefit to S&M/PB species is not significantly different. In fact, Phil Hall stated that all but two species remain viable under all alternatives. So the ecological difference between the alternatives is minor, and should be weighted appropriately in the decision.

In contrast to this, only 14 % of federal forests are available for harvest under the NFP, and greater than 50% of the Coquille Forest is already under a reserve status. This creates a significant financial difference between the four alternatives for not only the agencies but also this Tribe. This cost/benefit ratio should heavily weight any decision because the alternatives are virtually identical in relationship to species viability.

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With this in mind, we wish to submit our comments on all four alternatives:

No Action Alternative:

- To continue to survey for species which are virtually unidentifiable (either because they are not well described, or they do not reveal themselves in a timely manner) would give opportunity for further lawsuits and continue an unreasonable financial burden on this Tribe. The No Action Alternative would also leave in place the conflicting direction, which has led to a great deal of difficulty in adaptively managing our Forest. Without a doubt, any of the alternatives would be more favorable than this, and would give clearer direction as to “how” to manage, not just “what” to manage.

Provisions Common to Alternatives 1, 2 and 3:

- The Tribe strongly endorses the logical criteria that identify “how” a S&M/PB species is placed on the list or taken off. Subsequently we also endorse the removal of all species from the S&M/PB list that do not meet these criteria.
- Strategic surveys would increase the cost benefit for surveying difficult species. Spending money looking for species where you expect them and when you expect them rather than everywhere at all times relieves the Tribe of an undue financial burden with little scientific value.
- The trigger for surveying the S&M/PB species now reads “pre-ground disturbing activity” and is proposed to be changed to “pre-habitat disturbing activity”. Regardless of concern expressed by some environmentalists as to “who” is qualified to identify habitat, the Tribe feels that this is the only logical understanding of what the authors meant in the original NFP. Looking for an aquatic vertebrate in the desert makes no sense. This is a necessary edit.
- The Tribe also endorses the proposed criteria for determining whether a survey is practical.

Alternative 1 – Redefine Categories based on Species Characteristics:

- Alternative one from a balanced ecological and financial commitment is the most logical alternative.
 1. It successfully manages the S&M/PB species without placing a required timeline for completing the Strategic Surveys. Timelines have rarely been met and recently have been the impetus behind several lawsuits. This will allow Agencies and the Tribe to prioritize strategic surveys where it is financially possible and practically useful.
 2. While not the greatest financial relief, this alternative does decrease the current estimated survey costs by 82%.

Alternative 2 – Remove or Reassign Uncommon Species Within 5 Years:

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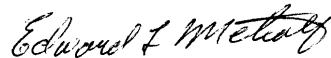
- This alternative would have been the preferred alternative for the Tribe if the 5-year timeline weren't required. The survey effort needed to complete the strategic surveys seems to create another opportunity for lawsuits when they are not completed as projected. Because of a lack of knowledge at the time the NFP/ROD was developed concerning the actual magnitude of effort to comply with the standards and guides, a failure to meet NFP timelines seems predestined.

Alternative 3 – Add Equivalent-Effort Surveys and 250-Meter Rare Site Buffers:

- This alternative is the most simple to follow, however, it is also the most impacting to the Tribe's small land base. With about 2000 acres currently available for harvest and a likelihood that endangered species may occupy several hundred acres of that, we cannot afford to play it safe around every "rare" species by removing scientifically valid options in lieu of a more simple and safe approach.
- Based upon Figure 3& 4-9, this alternative would set aside 42% of the currently harvestable forest. With a requirement to balance ecosystem management with public needs, this alternative would disregard human value in place of management ease. The Tribe feels that it is the Agencies' responsibility to create a balance between ecology and financial responsibility to the public. This takes the "quick fix" approach and limits options, likely over protecting species for the sake of ease. The Tribe very strongly stands against this non-scientific approach to land management.

As a result of our evaluation of the DSEIS, the Tribe recommends selection of Alternative I as the preferred alternative.

Sincerely,



Ed Metcalf
Chairman

cc: Gary Varner, Forester
BIA – Siletz Agency

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Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

March 3, 2000

In reply refer to: KECN-4

Survey and Manage SEIS
Content Analysis Enterprise Team
Attn: USDA Forest Service - CAET
P.O. Box 221090
Salt Lake City, UT 84122

Re: Comments on The Survey and Manage SDEIS

Dear Content Analysis Enterprise Team:

This letter represents Bonneville Power Administration's (BPA) comments on the Survey and Manage Draft Supplemental Environmental Impact Statement (SDEIS). Please incorporate and/or respond to these comments as reflected in the Final EIS.

One of the concerns BPA would like to address is the possible impact it might have on BPA's vegetation management program. BPA's provides electricity throughout the Pacific Northwest using a network of transmission lines and substations. One of BPA's public responsibilities is to assure adequate, economical, efficient and reliable power supply to the Pacific Northwest while fulfilling environmental and social obligations (such as protection and enhancement of fish and wildlife). To maintain safe and reliable power, BPA must control the vegetation, including large trees around electrical transmission facilities. Those facilities include the rights-of-way and the area next to them, substations, access roads, microwave sites and beam paths, and maintenance facilities.

A major electric power outage occurred on August 10, 1996, caused in part by trees that had grown too close to transmission lines. The outage affected a number of other utilities linked to the federal system. As a result, BPA decided to improve its efficiency and effectiveness on brush control practices and produce an EIS to look at how different vegetation control methods affect water quality, plant communities, fish and wildlife populations, land use, and other resources. Because many facilities are located on lands managed by the U.S. Forest Service (USFS) and Bureau of Land Management (BLM), BPA has been working closely with both agencies as partners in developing the vegetation management program EIS. A consistency between the USFS, BLM, and BPA needs to be established within vegetation management programs. The need of keeping trees out of the transmission lines to prevent power outages and the need to have resource management must have balance between the two. What efforts and communication plans are currently being done to facilitate these needs?

BPA currently uses the Northwest Forest Plan Riparian Reserves and Water Buffers list when applying herbicides within USFS-designated water buffer zones. In what way, if any, will this document affect the Riparian Reserves and Water Buffers listed by stream type and buffer size?

On page 29 (second paragraph) of Chapter 2, it mentions the completion of 1999 field survey data and the possible implication it might have on species category assignments. How often will new field survey data in the future be used to reassign species categories? Will this be re-evaluated every year, every five years, or on an as-needed basis? What types of data might be found that would change a species category assignment?

Under Alternative 2, there is concern of a substantial decline in Oregon red tree vole populations throughout large portions of its range and that the remaining populations could become more isolated. Why does it take 5 years to complete strategic surveys prior to determining whether to consider the red tree vole on the Agencies' sensitive species list? If alternative 2 is chosen, will the decline of red tree voles be compared to the populations of the northern spotted owl? Is the USFS aware of the agreement and protocol that BPA has established with the USFWS regarding the northern spotted owl? It seems that only certain districts of the USFS are aware of it and other districts are not. There should be a clear understanding and awareness of this protocol between USFS, BLM, BPA and USFWS. What effects will the loss of protection for approximately 12,000 acres of late-successional habitat at approximately 5,100 locations across the Northwest Forest Plan area have on the Marbled Murrelet, the Northern Spotted Owl and the Northern Bald Eagle?

BPA would like to thank you for the opportunity to comment on the SDEIS. Please contact me if you require additional information or have any questions.

Sincerely,

Eric N. Powers
Environmental Specialist



United States
Department of
Agriculture

Forest
Service

Deschutes
National
Forest

1645 Highway 20 East
Bend, OR 97701

File Code: 1350-2

Date: March 1, 2000

Route To:


Subject: Deschutes Provincial Advisory Committee Comments to the Survey and Manage
SDEIS

To: Regional Forester, Harv Forsgren

Dear Harv:

Enclosed are the comments from the Deschutes Provincial Advisory Committee (PAC). These represent a consensus of opinion. Please recognize that this diverse group of people offer a full range of opinions and have worked very hard to find areas of commonality. Letters that reflect individual comments from members will be submitted to the team separately. Thank you for the opportunity to comment.

Sincerely,

 SALLY COLLINS
Forest Supervisor, Deschutes National Forest

Enclosure

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Deschutes Provincial Advisory Committee Comments to the Survey and Manage DSEIS

We recommend analysis of a broader range of alternatives. There is an opportunity for finer gradations between the limits proposed in the offered alternatives. Additional alternatives should be explored between Alternatives Two and Three offered as well as a display of the effects associated with the abandonment of the Survey and Manage program and reliance on the reserve system alone and another alternative that prohibits the cutting of old growth timber, anywhere.

Specific Points:

Page 24: It is stated that “the changes proposed . . . would help achieve (and not alter) the relationship between levels of multiple-use goods and services originally projected.” This statement is a conclusion that is not supported by the analysis. The probable average annual timber sale level disclosed in the *Record of Decision on Management For Habitat for Late-successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl* was 1.1 billion board feet. Now, in the Survey and Manage DSEIS, this is documented on page xxix as 811 Million Board Feet (current declared) or 680 Million Board Feet (No-Action Alternative). Given the unknown number of rare site buffers that could be as large as the arbitrary 250-meters listed in Alternative 3, how could the referenced Page 24 statement be true for the timber output? Using timber as a surrogate (the only one qualified) makes the statement questionable as applied to all outputs.

Page 63: The subcommittee encourages the use of the best scientific knowledge and the use of the best taxon experts in the field. This is especially important when evaluating new information pertaining to adding, removing, or changing a species in Survey and Manage.

Page 67: In Alternative 3, the 250-meter buffers around occupied sites of rare species is an inappropriately rigid standard and should have more flexibility. The variety of organisms and the potential range of habitats do not allow any “one size fits all” prescription to work. Language similar to the direction for managing known sites (pages C-4, C-5) in the Standards and Guidelines would be more appropriate.

The priority between forest ecosystem health and protection of survey and manage species is unclear. The DSEIS refers several times to the impact of management activities, particularly prescribed fire. On one hand, the document calls for species persistence; on the other hand, some management activities are a necessary remedy for declining forest health on a landscape scale. This document could provide more guidance.

Deschutes Provincial Advisory Committee Member Affiliation

Sally Collins	DFO, Deschutes Forest Supervisor
Glen Ardt	Oregon Department of Fish and Wildlife
Barbara Lee	Coordinator, Deschutes County Watershed Council
Dan Ericksen	Wasco County Commissioner
Robert Schuppe	Hood River County Commissioner
Dave Leslie	Deschutes County Planning
Clay Penhollow	Confederated Tribes of Warm Springs
Don Gentry	Klamath Tribe
Tim Lillebo	Oregon Natural Resources Council
Kent Gill	Friends of the Metolious
Ted Young	Crown Pacific
Brad Fowler	Fowler Timber Co.
Leslie Hiatt	"At Large", Special Forest Products
Dave McClain	"At Large", Consultant
Christopher Stecher	Mt. Bachelor Ski Area
Dennis Oliphant	Sun Country Tours
Reis Hoyt	"At Large", School Teacher
Anne Saxby	"At Large", Hood River Soil and Water Conservation District Manager
Richard Nelsen	"At Large", Grazing Permittee
Gerald Henrickson	Bureau of Indian Affairs, Confederated Tribes of Warm Springs
Boyd Wickman	Retired, USFS Research
Mark Shaw	Bonneville Power Administration
Jerry Cordova	US Fish and Wildlife Service
William Kirchner	Environmental Protection Agency
Dick Nichols	Oregon Department of Environmental Quality
Shaaron Netherton	Bureau of Land Management
Randy Tweten	National Marine Fisheries Service
*Mollie Chaudet	USFS/Province Liaison

* Not a Chartered Member